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MICHAEL RODAK, JR., CLERK

In the

Supreme Court of the United States

OCTOBER TERM, 1978

No. 78-282

DONALD E. CURRY, ET AL.,

*v.**Petitioners,*DALLAS N.A.A.C.P., ET AL.,
and

NOLAN ESTES, ET AL.,

Respondents.

No. 78-253

NOLAN ESTES, ET AL.,

*v.**Petitioners,*

DALLAS N.A.A.C.P., ET AL.,

Respondents.

No. 78-283

RALPH F. BRINEGAR, ET AL.,

*v.**Petitioners,*

DALLAS N.A.A.C.P., ET AL.,

Respondents.

**ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE FIFTH CIRCUIT**

**REPLY BRIEF FOR THE PETITIONERS,
DONALD E. CURRY, ET AL**

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TO THE HONORABLE COURT:

Since the filing of Curry et al's initial brief, this Court has decided *Columbus Board of Education v. Penick*, 47 Law Week 4924 (July 2, 1979) herein "Columbus") and *Dayton Board of Education v. Brinkman*, 47 Law Week 4944 (July 2, 1979) (herein "Dayton II"). This Reply Brief is required to respond to that new authority to certain unfair characterizations of Curry' initial brief, and to recent changes in the Dallas Independent School District.

Curry et al, Petitioners, fervently pray that this Court will understand the following about their position. They are not opposed to integrated schools and their position in this Court does not arise out of any such opposition. Indeed, they are here because they favor integrated schools and feel that their position is the only method of ultimately achieving integration in the public schools of the central cities of America, a result which they devoutly desire. Secondly, Curry feels that the very survival of public education in the central cities of the United States and ultimately the very survival of the central cities of the United States is at stake in this proceeding. Lastly, these petitioners wish to point out that although their children are being asked to bear the brunt of whatever remedy is imposed by the United States Courts, neither they nor their children have any nexus to a school board that existed in 1954 from which their children are two school generations removed, nor do they have any nexus to the School Board or the Federal Courts as they existed in 1965 from which their children are a full school generation removed. Even more pointedly, Curry has no nexus at all to the Honorable T. Whitfield Davidson, United States District Judge, who, Plaintiffs-Respondents accurately point out in their brief did the student assignment in DISD until 1965, when the Fifth Circuit adopted

its racially neutral student assignment policy which was being followed until 1971.

Petitioners are as aware as this Court of the long ugly history of school boards trying to retain segregated schools and fighting integration in every conceivable way. Obviously that long history colors the thinking of this Court, as it has colored the thinking of every Court. However, the year is 1979, not 1960, and obviously since 1965 intelligent, well-intentioned United States Courts have attempted to achieve racial balance in the Dallas Independent School District. The results of those attempts for the last 14 years by the United States Courts are before the Court in this proceeding. The latest decision, by the Fifth Circuit, calls for additional action by the District Court.

Turning to the facts in *Columbus* and *Dayton II*, the Dallas Independent School District has had a majority to minority transfer program since 1971. The Dallas Independent School District since the enforcement of a strict racially neutral school zone policy by the Fifth Circuit in 1965 has not had any optional transfers. Children were required to go to the district in which they resided until 1971 with the adoption of the majority to minority transfers approved by the Court. Since 1971 no school could be built in the Dallas Independent School District without the approval of the United States District Court. Complete faculty desegregation of the Dallas Independent School District occurred in 1971 and has remained constantly true since then. The only direct cognitive purposeful act of desegregation by the School District cited by the District Court in this proceeding, upon which all remedies are based, was its failure to adopt some of the remedial programs suggested by the Courts from 1965 to 1971. All of these remedial pro-

grams were voluntarily adopted before trial in the original proceeding in this cause in 1971.

Being aware of all the distinctions set out in the paragraph above which could properly distinguish the Dallas Independent School District, the Dallas Independent School District was pursuant to State law, a segregated school district in 1954. As Plaintiff-Respondent Tasby et al in its brief before this Court points out, from 1956 to 1965 the Honorable T. Whitfield Davidson, United States District Judge, entered a series of conflicting orders ultimately resulting in the stair-step plan which was struck down in 1965 with the implementation of a racially neutral system by the Fifth Circuit.

As we read the most recent teachings of this Court in *Columbus* and *Dayton II*, a school district which was once a State-enforced, segregated district is not entitled to maintain a racially neutral student assignment policy based upon a neighborhood school concept. Petitioner would fervently hope that the distinctions set forth in the preceding paragraph distinguishes *Columbus* from the Dallas Independent School District, and will cause this Court to reverse the Fifth Circuit as set forth in our original brief, based on *Dayton Board of Education v. Brinkman*, 433 U.S. 406 (1977) (*Dayton I*). However, for purposes of this brief the assumption is that *Columbus* stands for the proposition that racially neutral neighborhood schools may no longer be a student assignment policy by school districts in cities which in 1954 were mandatorily segregated by State law, and the Districts and Courts are required to achieve racial balance. It is to this proposition that the remainder of this brief is addressed, in hopes that this Court will recognize its error.

Without questioning the good intentions of the Court in trying to achieve a desirable result, Petitioners would show

from the record in this case, that mandatory student reassignment and busing do not desegregate, but in fact resegregate and destroy the ability to achieve an integrated school district. The Dallas Independent School District has been used as a model of community support for a desegregation plan. The following is the result and facts of this District.

In October of 1970, the last October prior to the first busing order, there were 95,012 Anglo students in the Dallas Independent School District. That number of Anglo students had been increasing each year until 1970 when it was down 2% from October of 1969. (Def. Ex. 13) The elementary enrollment, however, was slightly up for Anglo students between 1969 and 1970. (Webster, Vol. VIII, p. 169) As of November 14, 1978, there were 45,141 Anglo students in the Dallas Independent School District, a loss of 49,871 students, or 52.49% of the Anglo students in the DISD at the last census before the court order of busing began. (All numbers for 1978 are from the official reports of the Dallas Independent School District required to be filed with the District Court and by motion added as a supplement to the record.) Since the new wave of busing ordered in the summer of 1976, the District lost an additional 12,285 Anglo students, or 21.39% of the remaining Anglo student body in three short years. Newspaper reports of this year's enrollment indicate that the decline in Anglo population is continuing. As of October 1979 there were 41,893 Anglo students, a decline in one year of 3,248 students or 7.2%.

The numbers are even more dramatic when those grades subject to mandatory student reassignment are examined. For example, in the northwest subdistrict grades 4 through 6 there was a decline of 47.56% of the Anglo student population from 3,592 to 1,883 in the three short years between

the scholastic population census used by the court in its order of 1976 and the scholastic population census as of November 14, 1978.¹ In the middle schools in the northwest subdistrict which were also reassigned by the district court, 49% of the Anglo students have disappeared during that period; the Court's order indicates 2,624 Anglo students should be in middle schools (grades 7 and 8), in fact only 1,339 were there as of November 14, 1978. In contrast, in the senior high schools (without student reassignment) in the northwest subdistrict, there was only a loss of 24.9% of the Anglo students. Obviously the lack of court ordered student assignment created a dramatic difference between grades 7 and 8 which lost 49% of the Anglo population on court ordered reassignment, and grades 9 to 12 a loss of 24.9% without court ordered student assignment. The numbers remain consistent in the other subdistricts of the Dallas Independent School District. In the northeast subdistrict grades 4 through 6 lost 1346 Anglo students, or 38.3% of the court's projected number. The middle schools, grades 7 through 8, with court ordered assignment, the district lost 1521 Anglo students, or 35% of the 2,334 estimated to be in the middle school. However, in senior high school, grades 9 through 12, where there was no court ordered student assignment, the loss was only 1,072 Anglo or 17.4% of the projected total of 6,168. Again about half the rate of loss compared to the court ordered student assignment plan.

Since children do not start at the high school level, and since high school children have siblings, it is by no means contended that the high school loss is not caused by the Court's orders, but clearly the loss is less.

Even more dramatic were the losses of those students proposed to be transported in connection with the plans.

¹ All declines are measured from projections in the District Court's opinion and appendices.

In the northwest subdistrict of 2,835 Anglo students to be transported under the Court's plan, only 1107 remain, a loss of 1,728 students, or 61% of those Anglo students who were supposed to be on busses. In the northeast subdistrict, 49% or 691 out of 1412 Anglo students disappeared who were supposed to be transported pursuant to the court's plan. In the southeast subdistrict (the only other subdistrict in which there was student transportation), the loss was 45% of the Anglo students.

The loss, however, is not limited to Anglos. 20% of the black students scheduled to be transported in all subdistricts are gone, and 12% of the Mexican-American students scheduled to be transported have disappeared.

Set out below is a table showing the student population of the high schools in the Dallas Independent School District by race as of November 14, 1978. These student bodies are in neighborhood school districts except for such changes as majority-minority transfers and magnet schools may occasion.

School	Anglo		Black		M-A		Total
	No.	%	No.	%	No.	%	
<i>Northwest District</i>							
Hillcrest Complex	1298	78.62	297	17.99	31	1.88	1651
Thomas Jefferson	967	58.32	403	24.31	262	15.80	1658
North Dallas	154	12.32	382	30.56	695	55.60	1250
Pinkston	17	.94	1493	82.35	290	16.00	1813
W. T. White	2215	90.22	109	4.44	92	3.75	2455
Metro North	50	26.46	125	66.14	14	7.41	189
Metro West	153	43.59	154	43.87	5	1.42	351
<i>Transportation Magnet</i>							
	73	26.55	158	57.45	43	15.64	275
<i>Northeast District</i>							
Bryan Adams	2598	85.97	157	5.20	209	6.92	3022
James Madison	6	.44	1336	98.60	11	.81	1355
Skyline Center	1832	51.74	1407	39.73	254	7.17	3541
Woodrow Wilson	660	46.91	305	21.68	425	30.21	1407
Health Professions	111	21.76	346	67.84	41	8.04	510

HIGH SCHOOLS — (Continued)

School	Anglo		Black		M-A		Total
	No.	%	No.	%	No.	%	
<i>Southwest District</i>							
Adamson	254	19.63	579	44.74	437	33.77	1294
David W. Carter	253	14.24	1447	81.43	73	4.11	1777
Kimball	1243	54.47	739	32.38	274	12.01	2282
Sunset	896	47.76	154	8.21	790	42.11	1876
<i>Southeast District</i>							
Lincoln	1	.09	1092	99.91	0	0	1093
Samuel	1403	74.79	344	18.34	120	6.40	1876
Grady Spruce	1203	54.46	725	32.82	274	12.40	2209
<i>East Oak Cliff</i>							
Roosevelt	5	.22	2278	99.35	10	.44	2293
South Oak-Cliff	7	.21	3390	99.50	10	.29	3407

Petitioner Curry, et al is unable to discern from a review of the high school population census what prevents these neighborhood schools with minority-majority transfer from being unitary schools. In assessing these schools it should be noted that all but three (Lincoln, Roosevelt and Pinkston) of the non-magnet schools began as all white schools. However, one thing is clear. Those schools in which the court has attempted to achieve racial balance, with only one exception, are minority isolated schools as defined by the Equal Educational Opportunity Act, 20 U.S.C. 1701, et seq. In the NAACP brief on p. 14, there are projected percentages which show eight middle schools of 50% less minority enrollment and one of more. In fact, there is only one middle school where minorities are not in a majority and in ten out of sixteen the schools are more than 60% minority.

The actions of the United States courts have already prevented meaningful integration in the Dallas Independent School District in those areas where it has adopted a man-

datory student assignment plan. Additional student assignment plans as demanded by the Fifth Circuit create an overwhelming inability by the School District to achieve anything like a racially integrated school.

Dallas is a sunbelt city enjoying an economic boom. Its unemployment rate is one of the lowest in the nation. As a central city, it is not a decaying, rotting, blighted area, but a vibrant, booming area. But ultimately a city cannot survive without children and without the amenity of a public school system. There are 32 public independent school districts ringing the Dallas Independent School District, including one residing wholly within it. Not one of those districts other than Dallas suffer from the indignities of court ordered student assignment. In 32 other school districts the traditional advertisement for a home "convenient to churches and schools" is a reality. The courts and the district may assign students to schools, but the decision of accepting that assignment is going to lie with parents. Dallas has been held out as a model to the nation of a city united to make the court ordered desegregation plan work. There were no pickets, no bombings, no rallies, no negatives. The problem was there were also no middle class students. These are not numbers that come from some sociologist's projections, these are actual numbers in the Dallas Independent School District. However, testimony put in evidence in this case indicates there is nothing unique about Dallas. In every school district meeting Dallas' criteria, a substantial minority population and suburban school districts surrounding the central city, the loss of Anglo students has been such that meaningful integration cannot exist. (See Curry Ex. 6, Appendix p. 260 et seq.)

Not only has the Anglo population declined in such a way as to prevent the meaningful integration of schools, but

the Anglo decline has really been a middle class or upper class decline. The testimony of Dr. William Webster, head of the Department of Research and Evaluation for the Dallas Independent School District, was the loss of Anglo students is really a loss of middle class and upper middle class student population in the Dallas Independent School District (Vol. VIII, page 192). It was his opinion that in addition to the Anglo loss we were also experiencing a loss of black middle class in the Dallas Independent School District. (Id.) After noting that study performance appeared to be the arena of debate on desegregation plans Dr. Webster testified "This approach is tantamount to fiddling while Rome burns. If a desegregation policy has as its principal observable effect, the resegregation of the public schools, whether or not a given group of students would have benefit from that policy is academic. Methods must be found to provide meaningful integrated experiences for school children while not upsetting the majority population to the point that population redistribution occurs. Only then can the effect of induced desegregation be meaningfully discussed and examined." (Vol. VIII, pp. 171-172).

Even Plaintiff witness Dr. Robert Crain's testimony was to the same resegregation result. Vol. VIII, p. 497-498. "What I said was if the school is designated predominantly black, then the desegregation plan is liable to be in trouble because a lot of white students aren't going to go. A lot of white students don't show up, so that's the problem."

This Court, if it chooses, can command the Dallas Independent School District to achieve racial balance in its schools. We suppose that if racial balance constitutes 5% of the Anglo students in each school in the district, and each school 95% minority, it can be achieved, because there are certain Anglo students who cannot escape the mandates

of the Court or the school system. But that is not what this Court is attempting to achieve nor is it what the Dallas Independent School District desires, nor is it what Curry believes is the best interest of any children. To order the District Court to achieve racial balance is like ordering the District Court and the Dallas Independent School District to cause the sea to retreat or the sun to stand still. The Court can command, but ultimately the people will decide.

Not only do the figures in every central city in the United States overwhelmingly show the failure of court ordered student reassignment to desegregate the systems and not only do such statistics show the overwhelming resegregation of the schools of the central cities, but the issue of to what purpose stares as a stark question in the eyes of any honest examiner. From the plaintiffs own brief in this Court comes the startling findings of plaintiffs' own witnesses that "Of twelve studies of desegregation at the junior high school and high school levels five show negative effects" ... page 86, footnote 42. "... only 9 of the 21 cases of desegregation in grades 3 or 4 showed positive results" ... page 86, footnote 42. The fact is that testimony by Armor, Coleman, Estes, Glaser, Felice and Webster, and the testimony by each of the educators and experts studying the issue such as Nancy St. John, overwhelmingly indicate that no positive results flow.

Plaintiff's witness, Dr. Robert Crain, testified at Vol. VIII, p. 447:

"No, I think the best single compendium is a book done by Nancy St. John called *School Desegregation — Outcomes for Children . . .*"

and at p. 502 of Vol. VIII:

"However, I should point out that Nancy St. John who did this review of the work looks at the same set of data and concludes that there is no evidence here that black students benefitted from desegregation. And its likely — she goes further and she finds in one chapter saying on the basis of her review of the evidence she would be opposed to massive busing and large scale busing, I think that's her words, because there is no evidence that the students benefit."

Dr. Webster testified as a result of studies conducted in the Dallas schools that:

(Vol. VIII, p. 179, l. 13-15)

"A. . . . Nonbused black students had more positive attitudes towards school than did bused black students.

"Q. All right. With respect to whether the black students attended a bused from rather than a bused to school, what was the result of your study?

"A. Black students attending bused from schools were more positive in attitudes than were black students that attended bused to schools."

(Vol. VIII, p. 180, l. 7-12)

"A. Black students in mostly white classes had a negative attitude towards school while those in mostly black classes had a positive attitude. Similarly, white students in mostly black classes had a negative attitude towards school while white students in mostly white classes had a positive attitude."

(Vol. VIII, p. 182, l. 9-16)

"Q. All right, now, putting it in simple laymen's terms, this would indicate that the students that remained in the predominantly minority schools had a more positive attitude towards white students than those that were either in attendance at or were bused to what had been more predominantly or majority white schools, is that correct?

"A. It would suggest that, yes."

(Vol. VIII, p. 182, l. 20-25)

"A. White students in mostly white classes had positive attitudes toward black students while white students in mostly black classes had a slightly negative attitude toward black students. So there was a significant difference between the class composition relative to attitudes toward black students among white students."

About Webster and his department, the testimony was as follows:

(Vol. VIII, p. 197, l. 15 to p. 198, l. 19)

"Q. Has the Research and Evaluation Department of the Dallas Independent School District received any recognition?

"A. Yes, I think it is probably generally recognized as the best Department of Research and Evaluation in the country. It has had outside auditors come in to audit the department on several different occasions, the most noteworthy of which was Dan Stufflebeam, who is one of the foremost evaluation therapists in the country.

"THE COURT: Who is it?

"THE WITNESS: Dan Stufflebeam who is one of the foremost evaluation therapists in the country. He was brought in as part of the Chase study last year and basically concluded that it was the best Department of Research and Evaluation in the country. Do you want me to read that quote into the record?

"Q. If you would like, you certainly may.

"A. In arriving — this is quoted from the report by Dan Stufflebeam. 'In arriving at an overall judgment of the evaluation in research work done in the DISD I compared what I saw in Dallas with what I observed in my past studies of other evaluation and research systems in school districts, in state education depart-

ments, federal agencies, research and development agencies and private companies. Based on these comparisons I am convinced that the DISD Research and Evaluation system is considerably stronger than any other I have observed."

The testimony of Dr. John W. Letson, former Superintendent of Schools of Atlanta, Georgia, testified about the transportation of the Atlanta schools to virtually an all black system. His testimony was that the loss of community support was the most tragic loss of all in the Atlanta school system (Vol. VIII, page 51). That loss of community support ultimately results in a public school system which cannot adequately function. The testimony of Dr. O. Z. Stevens of the Memphis School District in this proceeding about the difficulties of the school system after its loss of white students as a result of mandatory student assignment is as follows:

(Vol. VIII, p. 148, 1.13 to p. 149, 1.11)

"A. I think it's, you know, from all of this, there has been kind of a spinoff. I can remember five years ago when the preparation of a budget and the presentation of it to the City Council was sort of a formality. There was always the political rhetoric of the Board of Education has a little bit too much fat in its budget and you pare it back and it's a surface kind of concern. Most of it rhetoric for political purposes. We never had any difficulty. If we needed an eleven cent tax increase we got an eleven cent tax increase. We used to, 1970-'71, for example, our annual capital improvement budget would be between twelve and fifteen million dollars a year, that's the bonds that we were selling. Our Board of Education for the past three months has been wrestling with all sorts of internal strife over the approval of a three million dollars bond issue which even if the Board approves and finally gets

reconciled has about as much chance of being approved by the City Council as if it were eleven. You know, it's the attitude throughout Memphis as it relates to the public school system. Not one more penny for the public school system. It was reflected in a referendum for this past summer for a quarter cent increase in the sales tax for education, you know, it lost ten to one."

Obviously this Court is familiar with the further manifestations of school districts that cannot raise funds. The failure to raise adequate revenue is followed by teacher strikes, followed by the ultimate abandonment of any attempt at quality education. The final losers in all of this are the minorities which this Court is attempting to help.

CONCLUSION

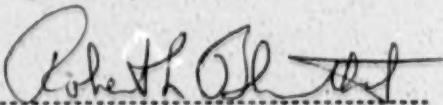
In reading the briefs filed herein by the Plaintiffs and the NAACP and the Justice Department, and in reading many of the past opinions of the Circuit Courts and indeed this Court, one is struck by the continual reference to long ago events by long departed school boards. Perhaps inappropriately in such a solemn brief Curry is reminded of the opening lines of Edgar Allan Poe's short story, "A Cask of Amontillado":

"A thousand injuries of Fortunato I have borne as I best could; but when he ventured upon insult, I vowed revenge."

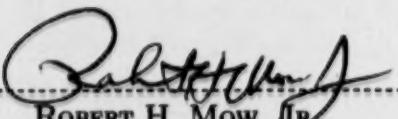
The Court will recall Fortunato's final words, chained in the wine cellar, as the last brick was placed in its position entombing him, "For the love of God, Montresor." The United States Supreme Court seems to say that the five words "Equal Protection of the Law" require that white children, because of their race, be transported to remote sections of the school district to attend schools to achieve

racial balance, and that black children, because of their race, be transported to remote sections of the school district to achieve racial balance. Constitutional amendment to change this tortured interpretation of those words, if not impossible, is extraordinarily difficult. One can only cry out in defense of the school systems in the central cities of America, "Mercy."

Respectfully submitted,



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Dated:

10/23/79

PROOF OF SERVICE

We, Robert L. Blumenthal and Robert H. Mow, Jr., attorneys for Petitioners Curry et al. herein, and members of the Bar of the Supreme Court of the United States, hereby certify that on the 23 day of October 1979, we served three copies of the foregoing Brief upon the following Counsel for Respondents, Counsel for other Petitioners, Counsel for Amicus Curiae, and the Respondent Pro Se:

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by mailing same to such Counsel and Respondent pro se
at their respective addresses and depositing the same in a
United States mail box in an envelope addressed to such
addresses with first class postage prepaid.

We further certify that all parties required to be served
have been served.



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CONCOURS

1

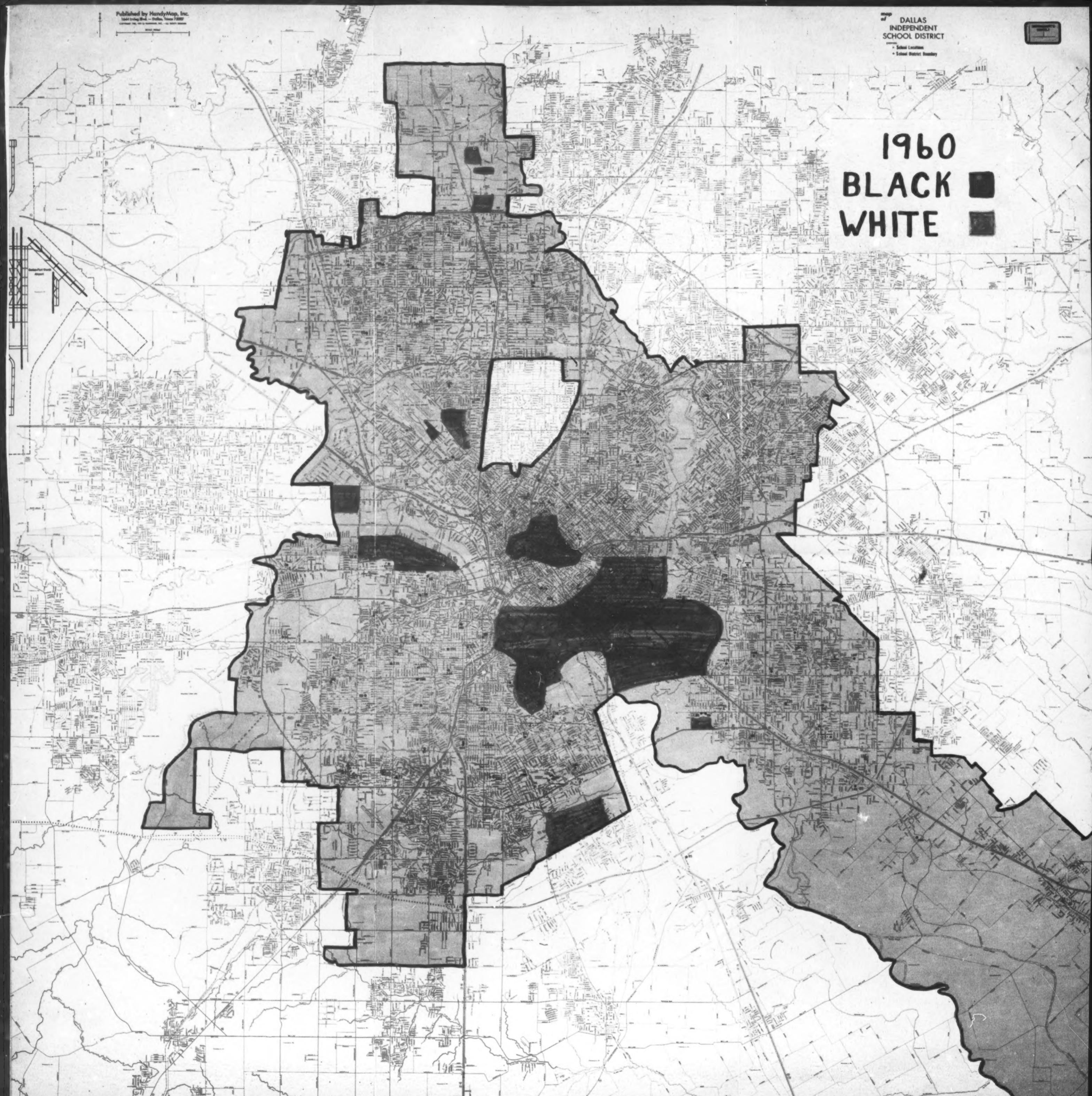
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DALLAS
INDEPENDENT
SCHOOL DISTRICT

• School Location
• School District Boundary

1960

BLACK
WHITE



ENROLLMENT PATTERNS

